

Compliance Letter in reference to WC Docket No. 05-196

Monday, November 28, 2005

In regard to public notice DA 05-2945, we wish to file this notice pursuant to a commission order.

Sound Choice Communications LLC is a small niche Voice over Internet Protocol communications provider licensed in Minnesota as a 'competitive local niche' telephone company. We provide communications cabling installations and service provider consulting services. Our staff has vast Internet experience and we have ventured into providing PSTN connected 'enhanced' telephone services for 44 customers in the Twin Cities, Minnesota local calling area.

911 Solution:

Sound Choice Communications offers PSTN Interconnected services as defined in the order to 26 customers. The other 18 customers do not purchase a combination of incoming and outgoing services interconnected to the PSTN service in such a way as to meet the orders definition. 19 of our 26 customers have responded to postcard notices and have returned a signature indicating they understand the limitations of our services and will apply the stickers to their access devices and share the limitations with users of their services. The remaining 7 customers hear a message describing the limitations on each outgoing phone call. 2 of our 26 customers have indicated they travel with their access devices and would require frequent updates to their address information. One customer is currently located outside our e911 service area in Phoenix Arizona.

911 Routing Information/Connectivity to Wireline E911 Network:

Sound Choice Communications is indirectly interconnected with the Minneapolis and Saint Paul Qwest Communications selective routers via our PRI telephone line provided by Century Tel Communications. Two Channels of our PRI line are dedicated to 911 calling. A dialing plan has been created at Century Tel on these two channels allowing us to dial a assigned telephone number to select a trunk group for sending our e911 calls. Our soft-switch translates our subscribers 911 call into the correct routing telephone number, thereby selecting the trunk-group and corresponding PSAP location.

Transmission of ANI and Registered Location Information:

The Metro 911 board in the Minneapolis, Saint Paul metropolitan area provides us with a copy of the MSAG or Master Street Address Guide. Our understanding is that Intrado, the database provider for Qwest Communications is the preferred source of the MSAG information, but Intrado refuses to provide the needed information directly as we do not have an account with them. We submit ALI or Address Location Information database entries to Century Telecom via email after validating the address information from this MSAG database. Century Telecom submits the information to Intrado usually within 5 business days. When we attempted to open an account with Intrado we were required to sign an unacceptable Non-Disclosure Agreement to begin any discussions. Our only understanding without this NDA is that an account will cost no less than \$250 per month. It's not financially possible to continue further with a monthly minimum of \$9 dollars per customer for access to MSAG information.

Our soft-switch sends a CPN or Calling Party Number information via our PRI connection to Century Telecom. Century Telecom uses this CPN to set the ANI number as the call is routed to the selective router and further to the PSAP. All connected PSAPs have the ability to receive the address information provided in the Twin Cities Metro area, to the best of my understanding.

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911 Coverage:

Sound Choice Communications provides an e911 solution compliant with the commission's requirements in the counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington in Minnesota. This covers 96% of our current customer base of 26 customers. Our marketing is limited to the area where e911 services are provided. Excluding the Internet website where we have little control over limiting its reach.

Obtaining Initial Registered Location Information:

Most customers require an access device to use our services. When an order is placed for services, we verify with the customer the shipping address is the primary address where the service will be used. We require the customer to sign a postcard detailing the services 911 limitations. This postcard is delivered to the address registered for e911 location at the time of the service request. On each outgoing call, the subscriber will hear a warning message until that postcard has been returned.

Obtaining Updated Registered Location Information:

Customers are provided with a web portal for managing their services online. From this portal a customer can confirm their e911 address location or make updates. All updates are MSAG validated and support or lack of support is provided instantly from this interface. As required by the order, customers may also use their access device to update the address by dialing 611 from their telephone set. Calls are answered 24 hours per day. An answering service has been contracted with to backup our internal staff with updates by voice. Customers may also update their account address by mail when paying their monthly statement, or by mailing a written letter at anytime. Changes are confirmed by email and voice phone calls when possible.

Technical Solution for Nomadic Subscribers:

We are not aware of any viable solution to interface with the other six thousand one hundred and fifty or so PSAP's to support our nomadic customer base of two and our 1 out of area customer. We would recommend that the FCC take actions to encourage the upgrades to America's PSAP centers as recommended in NENA's phase 3 plan for VoIP connected call centers.

Respectfully submitted:

Eric Osterberg
CEO, Network Engineer
Sound Choice Communications LLC